



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Robert W. Keyser, Esquire  
Taylor and Keyser LLC  
89 Haddon Avenue, Ste. B2  
Haddonfield, New Jersey 08033  
609 803-2180  
Attorneys for BB 316 Investments LLC

In Re:

Kevin Michael O'Connor, Debtor

Order Filed on May 5, 2021  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

Chapter 13

Case No.: 19-31145 CMG

CONSENT ORDER FOR RELIEF FROM THE AUTOMATIC DEBTOR STAY

The relief set forth on the following pages 2 and 3, is hereby **ORDERED**.

DATED: May 5, 2021

A handwritten signature in black ink, reading "Christine M. Gravelle", is written over a horizontal line.

Honorable Christine M. Gravelle  
United States Bankruptcy Judge

Kevin Michael O'Connor Chapter 13 Docket No. 19-31145 CMG  
**CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM STAY**  
Page 2 of 3

This matter having come before the Court on the Motion for Relief from the Automatic Stay filed on behalf of secured creditor BB 316 Investments LLC, and the parties having consented to the resolution set forth herein, it is ORDERED that:

1. The Debtor acknowledges that he has failed to pay post-petition real estate taxes on her property at 115 Hawthorne Street, Neptune, New Jersey.
2. The Debtor has agreed to, and has filed an Amended Plan that provides for the sale of the property on or before August 31, 2021. The tax lien of BB 316 Investments LLC shall be redeemed, in full, in the sum determined by the tax collector of the Township of Neptune, from the proceeds of the sale of the property.
3. The Debtor shall remain current in all post-petition property taxes and other municipal charges through the date of the sale of the property.
4. In the event that the Debtor shall fail to comply with the terms of this Order for a period of thirty (30) days, or the Debtor's modified Plan shall fail to be confirmed, Movant may so certify to this Court, on notice to the Debtor, Debtor's counsel and the Trustee, and an Order may be entered granting relief from the stay as sought in this motion.

Kevin Michael O'Connor Chapter 13 Docket No. 19-31145 CMG  
**CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM STAY**  
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4. Counsel fees and costs are awarded to Counsel for the Movant in the sum  
of \$681.00.

The undersigned agree to the form and entry of the within Order.

Taylor and Keyser LLC

By: 

Robert W. Keyser, Esq.  
Attorneys for BB 316  
Investments LLC

Oliver & Legg, LLC

By: 

William H. Oliver, Jr., Esq.  
Attorneys for the Debtor

In re:  
Kevin Michael O'Connor  
Debtor

Case No. 19-31145-CMG  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0312-3  
Date Rcvd: May 05, 2021

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 07, 2021:

| Recip ID | Recipient Name and Address   |
|----------|--|
| db       | Kevin Michael O'Connor, 115 Hawthorne Street, Neptune, NJ 07753-3917 |

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 07, 2021

Signature: /s/Joseph Speetjens

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 5, 2021 at the address(es) listed below:

| Name              | Email Address   |
|-------------------|---|
| Albert Russo      | docs@russotrustee.com   |
| Albert Russo      | on behalf of Trustee Albert Russo docs@russotrustee.com   |
| Andrew L. Spivack | on behalf of Creditor FREEDOM MORTGAGE CORPORATION andrew.spivack@brockandscott.com<br>wbef@brockandscott.com |
| Andrew L. Spivack | on behalf of Creditor Freedom Mortgage Corporation andrew.spivack@brockandscott.com wbef@brockandscott.com    |
| Denise E. Carlon  | on behalf of Creditor Toyota Motor Credit Corporation dcarlon@kmlawgroup.com bkgroup@kmlawgroup.com           |
| Gavin Stewart     | on behalf of Creditor Toyota Motor Credit Corporation bk@stewartlegalgroup.com                                |
| Matthew K. Fissel | on behalf of Creditor Freedom Mortgage Corporation wbef@brockandscott.com                                     |
| Matthew K. Fissel | on behalf of Creditor FREEDOM MORTGAGE CORPORATION wbef@brockandscott.com                                     |

District/off: 0312-3

User: admin

Page 2 of 2

Date Rcvd: May 05, 2021

Form ID: pdf903

Total Noticed: 1

Nicole Marie Savage

on behalf of Creditor FREEDOM MORTGAGE CORPORATION nicole.savage@brockandscott.com

Robert P. Saltzman

on behalf of Creditor Freedom Mortgage Corporation dnj@pbslaw.org

Robert W. Keyser

on behalf of Creditor BB 316 Investments LLC rkeyser@taylorandkeyser.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

William H. Oliver, Jr.

on behalf of Debtor Kevin Michael O'Connor court docs@oliverandlegg.com R59915@notify.bestcase.com

TOTAL: 13